

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

MICHELLE ANDERSON, an individual,
On Behalf of Herself and All Others
Similarly Situated,

Plaintiff,

v.

TRAVELEX INSURANCE SERVICES
INC. and TRANSAMERICA CASUALTY
INSURANCE COMPANY,

Defendants.

Case No. 8:18-cv-00362-JMG-SMB

**PLAINTIFF'S MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Pursuant to Federal Rule of Civil Procedure 23(e), Plaintiff Michelle Anderson hereby moves the Court to enter the proposed Final Approval Order and Judgment, which, *inter alia*: (1) finally approves the class action Settlement reached in the matter; (2) certifies the Settlement Class; (3) appoints Plaintiff Michelle Anderson as the Class Representative; (4) appoints Shanon J. Carson, Peter R. Kahana, Lane L. Vines, Y. Michael Twersky, and John G. Albanese of Berger Montague PC as Lead Counsel for the Settlement Class; (5) approves the Notice Plan and Notice issued to members of the Settlement Class, and binds all Settlement Class Members to the Final Approval Order and Judgment; (6) approves the distribution plan for the Net Settlement Fund as set forth in the Settlement Agreement; and (7) bars Settlement Class Members from asserting any claims for which a Release is given in the Settlement.

In support of her Motion, Plaintiff relies on the concurrently filed Memorandum of Law in support thereof, the exhibits attached thereto, and the Final Approval Hearing. Defendants Travelex Insurances Services, Inc., and Transamerica Casualty Insurance Company do not oppose the relief sought in this Motion.

Dated: September 1, 2021

Respectfully submitted,

/s/ John G. Albanese

John G. Albanese
BERGER MONTAGUE PC
1229 Tyler Street, Suite 205
Minneapolis, MN 55413
Tel.: (612) 594-5997
Fax: (612) 584-4470
jalbanese@bm.net

BURKE SMITH LAW
Burke Smith, NE Bar No. 19883
10730 Pacific St #100
Omaha, NE 68114
Tel.: (402) 718-8865
Fax: (402) 218-4391
burke@burkesmithlaw.com

BERGER MONTAGUE PC
Shanon J. Carson
Peter R. Kahana
Lane L. Vines
Y. Michael Twersky
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Tel.: (215) 875-3000
scarson@bm.net
pkahana@bm.net
lvines@bm.net
mitwersky@bm.net

EVANS LAW FIRM, INC
Ingrid M. Evans
3053 Fillmore Street, #236
San Francisco, CA 94123
Tel.: (415) 441-8669
ingrid@evanslaw.com

*Counsel for Plaintiff and the Proposed Settlement
Class*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 1, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on the following counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF:

Burke Smith
BURKE SMITH LAW
10730 Pacific Street, Suite 100
Omaha, NE 68114
burke@burkesmithlaw.com

Shanon J. Carson
Peter R. Kahana
Lane L. Vines
Y. Michael Twersky
BERGER MONTAGUE PC
1818 Market Street
Philadelphia, PA 19103
scarson@bm.net
pkahana@bm.net
lvines@bm.net
mitwersky@bm.net

Ingrid M. Evans
EVANS LAW FIRM, INC.
3053 Fillmore Street, Suite 236
San Francisco, CA 94123
ingrid@evanslaw.com

Markham R. Leventhal
CARLTON FIELDS, P.A.
Suite 400 West
1025 Thomas Jefferson Street, NW
Washington, DC 20007
mleventhal@carltonfields.com

Julianna Thomas McCabe
Michael N. Wolgin
CARLTON FIELDS, P.A.
2 MiamiCentral, Suite 1200
700 N.W. 1st Avenue
Miami, FL 33136
jtmccabe@carltonfields.com
mwolgin@carltonfields.com

/s/ John G. Albanese
John G. Albanese